

**EXHIBIT 106-B**  
**Redacted Version of**  
**Document Sought to be Sealed**

Page 1

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC. MDL No. 2843  
CONSUMER PRIVACY USER Case No. 18-md-02843-VC-JSC  
PROFILE LITIGATION

-----/

CONFIDENTIAL

REMOTE DEPOSITION OF JACKIE CHANG

Thursday, December 16, 2021

Job No. 4976949

Reported Remotely and Stenographically by:

JANIS JENNINGS, CSR No. 3942, CLR, CCRR

Pages 1 - 312

1

2

3

4

5

6

7

8                   REMOTE DEPOSITION OF JACKIE CHANG, located  
9        in Hillsborough, California, taken on behalf of the  
10      Plaintiffs, beginning at 9:43 a.m., on Thursday,  
11      December 16, 2021, sworn remotely by Janis Jennings,  
12      Certified Shorthand Reporter No. 3942, CLR, CCRR,  
13      located in the City of Walnut Creek, County of  
14      Contra Costa, State of California.

15

16

17

18

19

20

21

22

23

24

25

1       REMOTE APPEARANCES:

2

3           For Plaintiffs:

4                   KELLER ROHRBACK L.L.P.

5                   BY:    DEREK W. LOESER, ESQ.

6                   DAVID KO, ESQ.

7                   ADELE A. DANIEL, ESQ.

8                   1201 Third Avenue, Suite 3200

9                   Seattle, Washington 98101

10                  206.623.1900

11                  dloeser@kellerrohrback.com

12                  dko@kellerrohrback.com

13                  adaniel@kellerrohrback.com

14

15                  BLEICHMAR FONTI & AULD LLP

16                  BY:    LESLEY E. WEAVER, ESQ.

17                  ANNE K. DAVIS, ESQ.

18                  MATTHEW S. MELAMED, ESQ.

19                  555 12th Street, Suite 1600

20                  Oakland, California 94607

21                  415.445.4003

22                  lweaver@bfalaw.com

23                  adavis@bfalaw.com

24                  mmelamed@bfalaw.com

25

1 APPEARANCES:

2

3 FOR DEFENDANT FACEBOOK, INC.:

4 GIBSON, DUNN & CRUTCHER LLP

5 BY: RUSSELL H. FALCONER, ESQ.

6 LAURA C. MUMM, ESQ.

7 MATT BUONGIORNO, ESQ.

8 2001 Ross Avenue, Suite 2100

9 Dallas, Texas 75201

10 214.698.3100

11 rfalconer@gibsondunn.com

12 lmumm@gibsondunn.com

13 mbuongiorno@gibsondunn.com

14

15 Also Remotely Present:

16 DANIEL GARRIE, SPECIAL MASTER

17 JAMS

18 555 W. 5th Street, 32nd Floor

19 Los Angeles, California 90013

20

21 IAN CHEN, ESQ., Facebook, Inc.

22 SHAWNA HAYNES, Videographer

23

24

25

Page 69

1 again? 11:23

2 Q. Do you know when Facebook first started 11:23

3 using APIs with its partners? 11:23

4 A. I'm not sure I understand that question. 11:23

5 Technically, I don't know. 11:23

6 Q. Do you know who came up with the various 11:23

7 APIs that Facebook has? 11:23

8 A. No. 11:23

9 Q. Are you familiar with the concept of Friend 11:23

10 Sharing on the Facebook platform? 11:23

11 A. I think I've heard of it, but I don't know 11:23

12 what it is. 11:23

13 Q. Are you aware that on the Facebook platform 11:23

14 for a period of time, when a friend downloaded an 11:24

15 app, that app could obtain access to that person's 11:24

16 friends via Friend Sharing APIs? 11:24

17 MR. FALCONER: Objection. Form. 11:24

18 Go ahead. 11:24

19 THE WITNESS: I don't remember. 11:24

20 BY MR. LOESER: 11:24

21 Q. You don't remember anything about that? 11:24

22 A. No. 11:24

23 Q. That's not something you were involved at 11:24

24 all in? 11:24

25 A. I don't remember. 11:24

Page 92

1

2

3

4

5

6

7

[REDACTED] DEPOSITION REPORTER: "However, in the

11:56

[REDACTED] ..." Go 11:56

ahead, please.

BY MR. LOESER.

Q. "... [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]."

11:56

13

Do you see that?

11:56

14

A. Yes.

11:56

15

Q. Now, Miss Chang, do you recall being

11:56

16

involved in the -- making the changes that are

11:56

17

referred to here?

11:56

18

A. I don't.

11:56

19

Q. Why don't we go down this document to

11:56

20

page 2, under the heading "[REDACTED]."

11:56

21

Do you remember your involvement and the

11:56

22

conversation about [REDACTED]?

11:56

23

A. I remember [REDACTED] as a concept,

11:56

24

but I don't remember specific conversations.

11:57

25

Q. Okay. What was "[REDACTED]" as a

11:57

1 Q. "Apps can still [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] ."  
10 Do you see that? 11:58  
11 A. Yes. 11:58  
12 Q. Do you recall conversations around 11:58  
13 [REDACTED] ? 11:58  
14 A. I don't. 11:58  
15 Q. You have no memory of that? 11:58  
16 A. Not specifically. 11:58  
17 Q. Do you know what "deprecate" means? 11:58  
18 A. Yes. To -- to remove or wind down or end. 11:58  
19 Q. And so what [REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] t; is that right? 11:59  
23 A. Whatever was stated there. 11:59  
24 Q. And so [REDACTED] [REDACTED], and 11:59

Page 101

1 A. So I -- 12:08  
2 MR. FALCONER: Objection to form. 12:08  
3 THE WITNESS: So I don't remember enough to 12:08  
4 make that connection. 12:08  
5 BY MR. LOESER: 12:08  
6 Q. So looking at your email, it looks like you 12:08  
7 came up with a format for dealing with T0 partners 12:08  
8 with non-standard agreements and specific 12:09  
9 categories; is that right? 12:09  
10 DEPOSITION REPORTER: Excuse me. There was 12:09  
11 an interruption in the audio. Can you repeat your 12:09  
12 question, please, Counsel. 12:09  
13 BY MR. LOESER: 12:09  
14 Q. Yeah. Looking at your email, it appears 12:09  
15 that [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] [REDACTED]  
[REDACTED] [REDACTED]; right? 12:09  
18 A. So, then, I don't remember enough to make 12:09  
19 that assertion. 12:09  
20 Q. Okay. Well, let's just look through your 12:09  
21 tabs. The first tab you have -- these are your 12:09  
22 words; right? You wrote this email? 12:09  
23 A. It looks like it, yes. 12:09  
24 Q. [REDACTED] means 12:09  
25 something --

1 [REDACTED] 12:12

2 [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] 12:12

5 A. Again, I -- 12:12

6 MR. FALCONER: Objection. Form. 12:12

7 THE WITNESS: -- I don't recall at the time 12:12

8 to specify exactly what it is connected to. 12:12

9 BY MR. LOESER: 12:12

10 Q. Just a blank slate for you? 12:12

11 MR. FALCONER: Objection. Form. 12:12

12 THE WITNESS: Sorry. Is that a question 12:12

13 or... 12:12

14 BY MR. LOESER: 12:12

15 Q. Yeah. Yeah. Even looking at the email that 12:12

16 you wrote about this, you just can't remember 12:12

17 anything about it? 12:12

18 A. Yes. So, again, I was transitioning to a 12:12

19 new role, so this was not the top of my mind, and I 12:12

20 don't remember this. 12:12

21 Q. Is it fair to say that it was at the top of 12:12

22 your mind when you wrote this? 12:12

23 A. I don't remember at that time. 12:12

24 Q. Well, let's look at the next bullet: 12:12

25 " [REDACTED] [REDACTED] 12:13

1 that use [REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED] 12:13

5 Facebook." 12:13

6 What does it mean if something is of 12:13

7 "[REDACTED] Facebook"? 12:13

8 A. So I can't infer what it meant at that time, 12:13

9 but [REDACTED] [REDACTED]  
[REDACTED] 12:13

11 Q. Okay. And so you're making a recommendation 12:13

12 here for how to deal with integrations that involve 12:13

13 strategic value; is that right? 12:13

14 A. I don't remember specifically, so I don't 12:13

15 know how to answer that. 12:13

16 Q. Okay. It looks like in the email, you knew 12:13

17 enough about what read stream was or friend data to 12:13

18 use those words in this email and talk about what 12:13

19 should happen with that? 12:14

20 A. So, again, I don't remember enough at the 12:14

21 time to say that was the state of my mind. I don't 12:14

22 know. 12:14

23 Q. And what do you mean when you say, "Should 12:14

24 [REDACTED] [REDACTED]  
[REDACTED] " ? 12:14

Page 118

1 that you came up with for dealing with, among 12:27

2 others, [REDACTED] [REDACTED]

[REDACTED] [REDACTED]; right? 12:27

4 MR. FALCONER: Objection. Argumentative. 12:27

5 THE WITNESS: So, again, I don't know. 12:27

6 BY MR. LOESER: 12:27

7 Q. Now, Miss Chang, you were directly involved 12:28

8 in making the determination -- coming up with a 12:28

9 framework for the determination of what [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]; right? 12:28

12 A. So, again, I don't remember enough to say 12:28

13 that it was a determination. I just prepared a 12:28

14 [REDACTED], as 12:28

15 it said in the email. 12:28

16 Q. Tell me everything you can remember about 12:28

17 your involvement in figuring out which [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]. 12:28

20 A. So, again, I don't remember. I moved on to 12:28

21 Internet.org. I don't know what happened after that 12:28

22 spreadsheet. 12:28

23 Q. I didn't ask you if you remember what 12:28

24 happened after that. I am just asking you to 12:28

25 describe for me, what is the sum total of what you 12:28

Page 119

1 remember about your role in figuring out which 12:28

2 [REDACTED] [REDACTED]

3 [REDACTED]. 12:29

4 A. I don't remember. 12:29

5 Q. Did you receive annual performance reviews? 12:29

6 A. In what year? 12:29

7 Q. In any year. 12:29

8 A. I received a performance review. 12:29

9 Q. And in connection with your performance 12:29  
10 review, were you required to describe what you did 12:29  
11 during the year that was being reviewed? 12:29

12 A. I believe so, yes. 12:29

13 Q. And in those performance reviews, were you 12:29  
14 careful to make sure that you described all of the 12:29  
15 important, or at least the most important things, 12:29  
16 you worked on? 12:29

17 A. At that time, yes. 12:29

18 Q. And so if this transition to Platform 3 and 12:29  
19 your role in [REDACTED] [REDACTED]

20 [REDACTED] was 12:29  
21 an important part of that year, that would be likely 12:29  
22 discussed in the performance review? 12:30

23 A. I don't know. I can't speculate that. 12:30

24 Q. Okay. Would that be generally an accurate 12:30  
25 statement, though, that the tasks that you performed 12:30

Page 161

1 Q. And under the heading, [REDACTED] [REDACTED]  
[REDACTED] " can -- the first bullet says, [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] then " [REDACTED] [REDACTED]  
[REDACTED] " [REDACTED] [REDACTED] [REDACTED]  
[REDACTED] . " 14:26

6 Do you see that? 14:26

7 A. Yes. 14:26

8 Q. And, Miss Chang, do you recall being 14:26

9 involved in the [REDACTED] [REDACTED]  
[REDACTED] ? 14:26

11 A. No, I don't recall. 14:26

12 Q. And do you recall the effort to figure out 14:26

13 [REDACTED] ? 14:26

14 A. I don't remember. 14:26

15 Q. Do you remember anything at all about any 14:26

16 involvement you had in the subject matter of 14:26

17 whitelists? 14:26

18 A. Sorry. Can you state that question again? 14:26

19 Q. Do you remember being involved in any way in 14:26

20 figuring out [REDACTED] ? 14:26

21 A. Not -- I don't remember. 14:26

22 Q. This slide over on the right side refers to 14:27

23 " [REDACTED] . " 14:27

24 Was the rollout to [REDACTED] [REDACTED]  
[REDACTED] ? 14:27

1 A. Yes, I see that there. 14:28

2 Q. And do you see that those are -- those [redacted] [redacted]

© 2013 Pearson Education, Inc.

Page 14 of 29

5 that your understanding? 14:29

6 A. So -- yeah, so I don't know the context of 14:29

7 that, so I don't -- I don't know if it really is or 14:29

14:29

9 Q Okay. But you see that for [REDACTED] [REDACTED]

—  
—  
—

118 1.4.0.0

© 2014 Pearson Education, Inc.

© 2013 Pearson Education, Inc.

14/02/2023 Page 14 of 22

For more information, contact the Office of the Vice President for Research and Economic Development at 319-273-2500 or [research@uiowa.edu](mailto:research@uiowa.edu).

11. **What is the primary purpose of the `get` method in the `HttpURLConnection` class?**

Page 164

1 [REDACTED]) ."  
14:30

2 Do you recall there being [REDACTED]  
[REDACTED] ?  
14:30

4 A. Again, I don't remember this.  
14:30

5 Q. Okay. And you look at the next one:  
14:30

6 " [REDACTED]  
[REDACTED]  
[REDACTED] ."  
14:30

9 Do you recall what that refers to?  
14:30

10 A. No.  
14:30

11 Q. This next bullet item is:  
14:30

12 " [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] ."  
14:30

16 Do you have an understanding of what  
14:30

17 "extensions" are?  
14:30

18 A. I know what an extension is, but I don't --  
14:30

19 I don't recognize in this context.  
14:30

20 Q. Yeah. You don't recall in any way your  
14:30

21 involvement in sorting out whether [REDACTED]  
[REDACTED]  
[REDACTED] ?  
14:31

24 A. I don't remember.  
14:31

25 Q. Okay. And:  
14:31

1 " [REDACTED] [REDACTED] [REDACTED]  
2 [REDACTED] to Facebook." 14:31  
3 That must be something that you remember; 14:31  
4 right? 14:31  
5 A. I don't remember it. 14:31  
6 Q. Okay. You don't recall the role you played 14:31  
7 in determining which [REDACTED]  
8 [REDACTED] [REDACTED]  
9 [REDACTED] to Facebook? 14:31  
10 A. Correct. I don't remember. 14:31  
11 Q. As you sit here today, can you recall the 14:31  
12 difference between [REDACTED]  
13 [REDACTED] ? 14:31  
14 A. No, I can't. 14:31  
15 Q. Do you think you ever knew what the 14:31  
16 difference was? 14:31  
17 A. I don't know. 14:31  
18 MR. LOESER: We can go to the next exhibit. 14:31  
19 (Exhibit 13 marked for identification.) 14:32  
20 BY MR. LOESER: 14:32  
21 Q. This will be Exhibit 13, which is an 14:32  
22 email from Simon Cross to you and others, dated 14:32  
23 December 10th, 2013, the subject "Re: Simon's 14:32  
24 updates - 6th of December."  
25 14:32

Page 168

1 MR. FALCONER: Objection. 14:35

2 THE WITNESS: I don't remember. 14:35

3 BY MR. LOESER: 14:35

4 Q. Okay. Well, let's look at what it says you 14:35

5 were doing -- 14:36

6 SPECIAL MASTER GARRIE: Sorry. When we get 14:36

7 to a breaking point -- any idea when that may be? 14:36

8 MR. FALCONER: I was thinking after the 14:36

9 next -- after we are done with this document. 14:36

10 MR. LOESER: That's fine. 14:36

11 SPECIAL MASTER GARRIE: And then I would 14:36

12 like all the lawyers to be moved into another room. 14:36

13 Thank you. 14:36

14 BY MR. LOESER: 14:36

15 Q. Miss Chang, if you look at the [REDACTED] [REDACTED]

[REDACTED], you will see the last bullet. 14:36

17 Can you read that last bullet, please? 14:36

18 A. "Jackie leading on putting together 14:36

19 a [REDACTED] [REDACTED]

[REDACTED]. 14:36

21 Q. And is that accurate? 14:36

22 A. Again, I don't remember. 14:36

23 Q. So as you sit here today, you have zero 14:36

24 recollection of your being [REDACTED] [REDACTED]

[REDACTED] 14:36

Page 169

1 [REDACTED] ? 14:36

2 A. I don't remember this specifically. 14:36

3 Q. Do you remember anything at all about it? 14:36

4 A. No, I don't. 14:36

5 Q. Okay. Let's move up the string to page 2 of 14:37

6 the string under the same heading, [REDACTED] [REDACTED]

7 [REDACTED]." 14:37

8 You will see that this update, if you go 14:37

9 farther up the string, is November 25th, 2013. It 14:37

10 was sent by Simon Cross. The first recipient in the 14:37

11 "to" list is you. 14:37

12 Do you see that? 14:37

13 A. Sorry. What date? 14:37

14 Q. November 25th, 2013. 14:37

15 A. Okay. 14:37

16 Q. First recipient, first person Simon put on 14:37

17 that "to" line was Jackie Chang; right? 14:37

18 A. Well, I don't know if I'm -- I'm the first 14:37

19 person that shows up there. 14:37

20 Q. All right. And let's go down to "[REDACTED] [REDACTED]

21 [REDACTED]." So why don't you read the second 14:37

22 bullet. 14:37

23 A. "[REDACTED] -- Jackie 14:37

24 working closely with Marie and [REDACTED] [REDACTED]

25 [REDACTED] 14:37

1 [REDACTED] [REDACTED] [REDACTED]  
2 [REDACTED] [REDACTED] [REDACTED]  
3 [REDACTED] [REDACTED] [REDACTED]  
4 [REDACTED] [REDACTED] [REDACTED]  
5 [REDACTED] [REDACTED] 14:38  
6 Q. So do you remember working closely with 14:38  
7 Marie in [REDACTED] 14:38  
8 A. I don't. 14:38  
9 Q. And who is Marie? 14:38  
10 A. I don't know which Marie it may be referring 14:38  
11 to. 14:38  
12 Q. Okay. And so, Miss Chang, you're telling 14:38  
13 the jury that even though this bullet indicates that 14:38  
14 you were "working closely with Marie in [REDACTED] [REDACTED]  
15 [REDACTED]  
16 [REDACTED] [REDACTED] 14:38  
17 [REDACTED] " you have utterly no recollection of anything 14:38  
18 relating to that task? 14:38  
19 A. Correct. 14:38  
20 MR. LOESER: This is a fine time to take a 14:38  
21 break, as Special Master Garrie has requested. 14:38  
22 THE VIDEOGRAPHER: Okay. This marks the end 14:39  
23 of media No. 3 in the deposition of Jackie Chang. 14:39  
24 Going off the record. The time is 2:39. 14:39  
25 (Off the record.) 14:39  
26 THE VIDEOGRAPHER: This marks the beginning 15:04

Page 182

1 A. Yes. 15:20

2 Q. Okay. If you could please read the third 15:20  
3 bullet. 15:20

4 A. " [REDACTED] [REDACTED] 15:20

5 [REDACTED] [REDACTED] - 15:20  
6 apps will only [REDACTED] [REDACTED]

7 [REDACTED] [REDACTED] [REDACTED]

8 [REDACTED] [REDACTED] [REDACTED]

9 [REDACTED] [REDACTED] [REDACTED]

10 [REDACTED] [REDACTED] 15:20

11 Q. Okay. And do you recall the -- that as part 15:20  
12 of this PS12 update, there was going to be the 15:20  
13 removal of access to non-app friends permissions? 15:20

14 A. So I don't remember. 15:21

15 Q. Okay. And if you look at -- can you read 15:21  
16 the next bullet. 15:21

17 A. " [REDACTED] [REDACTED] 15:21  
18 [REDACTED] [REDACTED] [REDACTED] . 15:21

19 Q. Okay. Do you know what that means and do 15:21  
20 you recall that happening? 15:21

21 A. I know what I think [REDACTED] [REDACTED] 15:21  
22 [REDACTED] [REDACTED] [REDACTED], but I

Page 216

1 A. Yes. I remember the slide. 16:24

2 Q. Right. And you helped develop those 16:24  
3 categories; right? 16:24

4 A. I don't remember specifically. 16:24

5 Q. But your email appears to indicate that you 16:24  
6 helped to develop those categories; right? 16:24

7 A. So, again, whatever the email says, but I 16:24  
8 don't remember that specific moment in time. 16:25

9 Q. And Miss Chang, do you know how many total 16:25  
10 apps and partners were given continued access to 16:25  
11 friends permissions? 16:25

12 A. No, I don't. 16:25

13 Q. How about read permissions? 16:25

14 A. I don't. 16:25

15 Q. Do you know if there were records kept of 16:25  
16 all the apps and partners that were given continued 16:25  
17 access to friends and read permissions? 16:25

18 A. I don't know. 16:25

19 Q. Who would know that? 16:25

20 A. I don't -- I don't know. 16:25

21 Q. Okay. You have no idea? 16:25

22 A. Not for an individual person, no. 16:25

23 Q. And so in your work now with academic 16:25  
24 partnerships, if you wanted to figure out if an 16:25  
25 academic partner had continued access to friends 16:25

Page 219

1 know if it could be classified as whitelist. 16:28

2 Q. The term "whitelist" is not one you have 16:28

3 used so frequently that you remember to this day 16:28

4 what it means? 16:28

5 A. No. 16:28

6 Q. Do you have any idea of the process that's 16:28

7 used to determine if an app developer or partner is 16:28

8 whitelisted so that they have continued access to 16:28

9 friends permissions? 16:28

10 A. Yeah. I don't recall it. 16:28

11 Q. Do you know if Facebook keeps records of 16:28

12 whitelisted developers/partners? 16:28

13 A. I don't know. 16:28

14 Q. You have no recollection at all as to 16:28

15 whether that information is collected and maintained 16:29

16 in one place so that someone could easily find out 16:29

17 who are all of the whitelisted partners or 16:29

18 developers? 16:29

19 A. So again -- 16:29

20 MR. FALCONER: Asked and answered. 16:29

21 THE WITNESS: -- that's outside my scope, so 16:29

22 I don't know. 16:29

23 BY MR. LOESER: 16:29

24 Q. Now, if we go back to slide -- I'm sorry, 16:29

25 deck -- Exhibit 12 for a minute. And if you look at 16:29

Page 223

1 THE WITNESS: So, again, I don't -- I don't 16:34  
2 remember, so I can't assume. 16:34

3 BY MR. LOESER: 16:34

4 Q. Did you have any interaction with a partner 16:35  
5 in a discussion of the information -- the 16:35  
6 permissions the partner was interested in, where 16:35  
7 they said to you, Hey, we want to arrange so that we 16:35  
8 have permission to access friends video? 16:35

9           A.     I don't remember specifically like           16:35  
10    individual permissions.                                   16:35

11 Q. Okay. Do you remember any conversations at 16:35  
12 all about friends permissions with any partner? 16:35

13 A. I don't remember specifically anything about 16:35  
14 friends permission. 16:35

15 Q. Do you remember anything generally about 16:35  
16 friends permissions? And particularly, I'm asking 16:35  
17 if any partner that you have worked with raised that 16:35  
18 as a permission that they were interested in gaining 16:35  
19 access to. 16:35

20 A. I don't -- I don't -- I don't recall. 16:35

21 MR. LOESER: Okay. We can go to Exhibit 21. 16:36

22 (Exhibit 20 marked for identification.) 16:36

23 MR. LOESER: Oh, is it 20? Yeah. 16:36

24 While that's being loaded, for the record. 16:36

25 this is an email from Simon Cross to, among others. 16:36

Page 224

1 yourself, dated October 24th, 2013, "Subject: 16:37

2 [REDACTED] - feedback by 16:37

3 end of day Sunday, please." With attachment, 16:37

4 "[REDACTED]," attaching an 16:37

5 Excel spreadsheet. 16:37

6 BY MR. LOESER: 16:37

7 Q. Do you see that document, Miss Chang? 16:37

8 A. I see the email, yes. 16:37

9 Q. So this email starts with Mr. Cross saying: 16:37

10 "Hi guys, Over the last few weeks, 16:37

11 you'll have noticed [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] Going forward, this 16:37

14 [REDACTED] 16:37

15 of our lives -- it's where [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

23 [REDACTED] " 16:38

24 Did I read that accurately? 16:38

25 A. Yes, you -- yes. 16:38

25 Q. Do you recall receiving this email and the 16:38

Page 225

1 attachment that it provides? 16:38

2 A. I don't recall it specifically. 16:38

3 Q. Do you recall it at all? 16:38

4 A. No, I don't. 16:38

5 Q. And can you tell me what "app-based GKs" 16:38

6 are? 16:38

7 A. I don't know. 16:38

8 Q. You have no recollection whatsoever? 16:38

9 A. No. Again, I'm not -- I'm not the technical 16:38

10 person, so I just don't -- I don't know technically 16:38

11 what it would mean. 16:38

12 Q. Okay. Do you know what the Capabilities 16:38

13 tool was? 16:38

14 A. Not specifically. I've heard of it, but I 16:38

15 don't know it in detail. 16:39

16 Q. Well, what have you heard about it? 16:39

17 A. It looks like some sort of permissioning 16:39

18 tool. 16:39

19 Q. And what does that mean? 16:39

20 A. It grants permissions. 16:39

21 Q. Who does it grant permissions to? 16:39

22 A. So, again, I don't -- I don't know the 16:39

23 technical specifics, so I don't feel comfortable 16:39

24 talking about it in depth because I might 16:39

25 mischaracterize it. 16:39

Page 226

1 Q. Okay. You've said all that you feel 16:39  
2 comfortable saying about it? 16:39

3 A. Well, like all that I know about it. 16:39

4 Q. And before I asked you if there was a place 16:39  
5 where whitelists were managed, and this seems to 16:39  
6 indicate that [REDACTED] [REDACTED]

[REDACTED] [REDACTED] 16:39

8 Does that refresh your recollection about 16:39  
9 where whitelists are managed? 16:39

10 A. No. 16:39

11 Q. Okay. And this uses the term "[REDACTED]" [REDACTED]  
[REDACTED], which previously we saw you were 16:40  
13 tasked with various things having to do with 16:40  
14 [REDACTED]. 16:40

15 Can you provide any more information on your 16:40  
16 understanding of [REDACTED]? 16:40

17 MR. FALCONER: Objection. Form. 16:40

18 THE WITNESS: No. Again, this wasn't the 16:40  
19 top of like my -- my focus, so I don't really have a 16:40  
20 lot of recollection around this. 16:40

21 BY MR. LOESER: 16:40

22 Q. Do you recall that based on the information 16:40  
23 that was sent to you here and the description of 16:40  
24 this email, there were [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] 16:40

Page 240

1 yes, it seems like I'm posing the question. 17:01

2 Q. So, certainly, as of the date of this email, 17:01

3 March 24, 2014, you knew that there would be [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

7 A. So I don't know, at that moment in time. 17:02

8 Q. So looking at what you wrote, you're telling 17:02

9 me you can't determine, based on what you wrote, 17:02

10 that there were [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] for 17:02

12 PS12N? 17:02

13 A. I know what I wrote, but I don't remember it 17:02

14 in specificity where I would know the full context 17:02

15 of what you're implying. 17:02

16 Q. Okay. Do you have any reason to believe 17:02

17 that the information that you wrote in this email is 17:02

18 inaccurate? 17:02

19 A. I don't know. 17:02

20 Q. You don't have any reason to believe that, 17:02

21 do you? 17:02

22 A. I mean, there's always a possibility of 17:02

23 inaccuracy, but I don't know. It's not my intent to 17:02

24 be inaccurate. 17:03

25 Q. Did you have any involvement at any point in 17:03

---

**From:** Konstantinos Papamiltiadis </O=THEFACEBOOK/OU=EXTERNAL  
(FYDIBOHF25SPDLT)/CN=RECIPIENTS/CN=942ACCD3D3C54FBEA8B7253E97A8A6D7>  
**Sent:** Wednesday, August 21, 2013 8:09 AM  
**To:** Ime Archibong; Jackie Chang  
**Cc:** Chris Daniels; Simon Cross  
**Subject:** Re: [REDACTED]  
**Attachments:** [REDACTED].xlsx

+ Simon

Thanks a lot, Jackie. This is great – I have included the additional info for the [REDACTED] in the attached spreadsheet as well (for completeness).

A little update from my end, and how I think we should tie this to what Jackie has put together. Simon managed to pull a list of [REDACTED]s. You can see [REDACTED]. The most interesting data points having [REDACTED] (I took the liberty to make a recommendation as well btw – [REDACTED]):

1/ [REDACTED]: [REDACTED] The main reason is [REDACTED]. Typical example is [REDACTED]. Removing access to the full friends list for [REDACTED]. My recommendation is: [REDACTED]

2/ [REDACTED]. Recommendation: [REDACTED]

3/ [REDACTED] From [REDACTED] and the likes. Some of them should obviously not have access such as [REDACTED], etc. In particular for [REDACTED] we should use the framework developed by Jackie. RECOMMENDATION: User Jackie's framework

4/ [REDACTED] Unlike the other [REDACTED] a lot more [REDACTED]. If we restrict access to user's friends that this one and [REDACTED] given they are [REDACTED]. Recommendation is: [REDACTED]

5/ [REDACTED] listed here, mostly focused on [REDACTED] and to a lesser extent on [REDACTED] (this was the dominant category for newsfeed inside [REDACTED]. The use of Friends list is [REDACTED] here, if I may say. I would love to know if [REDACTED] – I suspect [REDACTED] data. My recommendation is: [REDACTED] This may surprise you, but I am working on a deck to assess the [REDACTED] and I think besides [REDACTED] we can [REDACTED]; while [REDACTED] My plan was to finish this before the end of the week (when I am off on holidays), but most probably I will conclude it when I am back.

6/ [REDACTED] Also a [REDACTED] under this category. Friends list is [REDACTED]. Us removing full access to the friends list would [REDACTED]. Recommendation is: [REDACTED]

7/ [REDACTED] of apps on this vertical. They need access to [REDACTED] without this, however, I am not sure if it's a vertical that [REDACTED]  
Recommendation is: [REDACTED]

8/ [REDACTED] use case here. However I don't think we should [REDACTED] them [REDACTED] and we should [REDACTED] with [REDACTED]  
Recommendation is: [REDACTED]

9/ [REDACTED] Most of the unknown are in fact [REDACTED], investigating. In any case, [REDACTED]. Recommendation is: [REDACTED]

As a general note, I think we need to carry on with this exercise to figure [REDACTED] that we [REDACTED]; before we can make a decision for [REDACTED]. For both the [REDACTED], we can use Jackie's framework to assess [REDACTED] for those partner falling under the [REDACTED] and then make up a decision based on the criteria outlined by Jackie below.

Let me know what you think,  
kp

---

**From:** Ime Archibong <ime@fb.com>  
**Date:** Wednesday, August 21, 2013 6:31 AM  
**To:** Jackie Chang <jackie@fb.com>  
**Cc:** Chris Daniels <chrisd@fb.com>, Konstantinos Papamiltiadis <kpapamiltiadis@fb.com>  
**Subject:** Re: [REDACTED]

Thanks, Jackie. Glad you two linked up on this work. Looks like you have the right buckets flagged. One nitpick suggestion would be to [REDACTED] under some term that represents [REDACTED]. We know that there is going to be [REDACTED] coming out of these changes, but we're just looking [REDACTED].

Sent from my iPhone

On Aug 21, 2013, at 2:30 AM, "Jackie Chang" <jackie@fb.com> wrote:

Ime & Chris,

Working with KP to further [REDACTED] that we should address. KP is working on the pulling the same analysis of [REDACTED], but we're also working in parallel to [REDACTED] that we should be solving for:

<https://docs.fb.com/sheet/ropen.do?rid=osbge9fce0156e72340bc9b80ea4fa6bdc2f8>

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

- [REDACTED] Potential partners/cases that may [REDACTED]
- [REDACTED] that use read stream or friend data and [REDACTED]. Should [REDACTED] to fb.

- [REDACTED] to fb. [REDACTED]  
[REDACTED] g, but may need some [REDACTED] e.
- [REDACTED] who's [REDACTED]  
[REDACTED] Should be part of [REDACTED] flag.
- In the Pipeline: [REDACTED] in the works where they've been [REDACTED] fb.  
This may be [REDACTED] as our [REDACTED] and  
[REDACTED] that they [REDACTED]

This should be complete by EOW; however, Constantin will be using this on Thurs for a discussion with Vernal on [REDACTED]. Let us know of any feedback.

Thanks!  
Jackie

---

**From:** Simon Cross </O=THEFACEBOOK/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=SIMON CROSS>  
**Sent:** Tuesday, December 10, 2013 12:28 PM  
**To:** Jackie Chang; Ime Archibong; Konstantinos Papamiltiadis; Bryan Hurren; Monica Mosseri  
**Subject:** Re: Simon's Updates - 6th Dec

[REDACTED] on [REDACTED]

- [REDACTED] plan to launch around Dec 22nd or may delay until 2nd week in Jan
- Work on both sides to [REDACTED] before we look to lauch.
- Need [REDACTED] to get final OK to launch

[REDACTED]

- [REDACTED] - [REDACTED] coming close to [REDACTED], altogether
- [REDACTED] - [REDACTED] - now being checked by [REDACTED] before being setup to [REDACTED] - will be used by [REDACTED], and by [REDACTED]

[REDACTED]

- Approval from [REDACTED] to continue along the chosen path with [REDACTED]/[REDACTED] ( [REDACTED] we get [REDACTED], they get [REDACTED]). Next steps are to sharpen up the work on FB's side to give them access to [REDACTED] and which [REDACTED] [REDACTED] that.
- Beginning to plan strategy for [REDACTED] around [REDACTED] from aggregators or [REDACTED]

[REDACTED] ([REDACTED])

- Deal [REDACTED] - still waiting for a [REDACTED]. [REDACTED], but more likely now in [REDACTED]
- [REDACTED] (for now) until the [REDACTED].

--  
Simon Cross  
Product Partnerships, Facebook

---

**From:** Simon Cross <[si@fb.com](mailto:si@fb.com)>  
**Date:** Monday, November 25, 2013 at 8:41 AM  
**To:** Jackie Chang <[jackie@fb.com](mailto:jackie@fb.com)>, Ime Archibong <[ime@fb.com](mailto:ime@fb.com)>, Konstantinos Papamiltiadis <[kpapamiltiadis@fb.com](mailto:kpapamiltiadis@fb.com)>, Bryan Hurren <[bryanhurren@fb.com](mailto:bryanhurren@fb.com)>, Monica Mosseri <[mwalsh@fb.com](mailto:mwalsh@fb.com)>  
**Subject:** Re: Simon's Updates - 22nd Nov

- Met with Trip [REDACTED] onsite in MPK. They were [REDACTED] but they understood our message about consistency and were glad we're working to improve conversion across the board. We told them [REDACTED] date. We agreed to work with them to [REDACTED].

- SoundCloud weeks away from launching their new album-art image heavy widget. Ime and I working to get approval to ramp their HTML5 widget to 100% of users (currently 1% of users and 100% of employees not in litestand). Some eng work needed on our side, and a security review likely, but no other major blockers other than bandwidth on our side.

- [REDACTED]
- [REDACTED]
- [REDACTED] – Jackie working closely with Marie and [REDACTED]
- [REDACTED]
- [REDACTED]

- Met with [REDACTED] / [REDACTED] to scope out the [REDACTED] as part of our [REDACTED] Subsequently met with [REDACTED] [REDACTED] Need another iteration on the exact API methods which need to be improved/built, and the [REDACTED] <[REDACTED]> we need them to implement.
- Starting to work more closely with the [REDACTED] [REDACTED] etc) and [REDACTED] [REDACTED] as well as companies new to us like [REDACTED] Early days for this work stream, and the team is still settling in from the re-org – so please forward request around [REDACTED] to Me+Rob rather than going directly to the product team so as to reduce thrash for them.

S

--  
Simon Cross  
Product Partnerships, Facebook

---

**From:** Simon Cross <[si@fb.com](mailto:si@fb.com)>  
**Date:** Friday, November 8, 2013 at 6:59 PM  
**To:** Jackie Chang <[jackie@fb.com](mailto:jackie@fb.com)>, Ime Archibong <[ime@fb.com](mailto:ime@fb.com)>, Konstantinos Papamiltiadis <[kpapamiltiadis@fb.com](mailto:kpapamiltiadis@fb.com)>, Bryan Hurren <[bryanhurren@fb.com](mailto:bryanhurren@fb.com)>, Monica Walsh <[mwalsh@fb.com](mailto:mwalsh@fb.com)>  
**Subject:** Re: Simon's Updates - 8th Nov

PLATFORM

- [REDACTED] sent us their [REDACTED] so the team can get testing

- [REDACTED] gave us some [REDACTED]

- [REDACTED] still [REDACTED]

[REDACTED] We're going to have a call to tease this out some more, and sync with Aryeh on if this is a thread worth following

[REDACTED]

- KP had a call with Trip Advisor who have some feedback/concerns about this materially affecting their business. We need to work through these to drive deprecation by Jan 31

[REDACTED]

- [REDACTED] are back in for the [REDACTED]. They confirmed that [REDACTED] for them and so they're going to [REDACTED]. Graham is working to on board them onto the [REDACTED]
- The [REDACTED] [REDACTED]. Call next week with [REDACTED] to discuss the details.

[REDACTED]

- Landed on a clear [REDACTED] for the work we need to do to prep for PS12n – [REDACTED]
- [REDACTED] :: <https://our.intern.facebook.com/intern/projects/milestones/?id=1434646163424174>
- [REDACTED]
- Key focus this week is [REDACTED]
- Jackie leading on putting together a [REDACTED].

--

Simon Cross

Product Partnerships

[www.facebook.com/sicross](http://www.facebook.com/sicross) @sicross

Facebook, 1601 Willow Road, Menlo Park, CA 94025, USA

---

**From:** Simon Cross <[si@fb.com](mailto:si@fb.com)>

**Date:** Monday, October 28, 2013 at 10:40 AM

**To:** Jackie Chang <[jackie@fb.com](mailto:jackie@fb.com)>, Ime Archibong <[ime@fb.com](mailto:ime@fb.com)>, Konstantinos Papamiltiadis <[kpapamiltiadis@fb.com](mailto:kpapamiltiadis@fb.com)>, Bryan Hurren <[bryanhurren@fb.com](mailto:bryanhurren@fb.com)>, Monica Walsh <[mwalsh@fb.com](mailto:mwalsh@fb.com)>

**Subject:** Re: Simon's Updates - 25th Oct

#### PLATFORM

[REDACTED]

- [REDACTED] have coverage for [REDACTED]. Shipping [REDACTED] week, awaiting updated mocks from us to share with [REDACTED]
- [REDACTED] still [REDACTED] this week also

- [REDACTED] (s) committed to [REDACTED]
- [REDACTED] – KP speaking them this week
- [REDACTED] – [REDACTED] – hope to [REDACTED]

- Discussions ongoing with [REDACTED] deadline tight. [REDACTED]

**Simon Cross**  
**Product Partnerships**  
www.facebook.com/sicross @sicross  
Facebook, 1601 Willow Road, Menlo Park, CA 94025, USA

**From:** Simon Cross <si@fb.com>  
**Date:** Friday, October 11, 2013 5:33 PM  
**To:** Jackie Chang <jackie@fb.com>, Ime Archibong <ime@fb.com>, Konstantinos Papamiltiadis <kpapamiltiadis@fb.com>, Bryan Hurren <bryanhurren@fb.com>, Monica Walsh <mwalsh@fb.com>  
**Subject:** Simon's Updates - 11th Oct

## PLATFORM

- [REDACTED] to have [REDACTED] by the end of next week – hope to have more info [REDACTED] by end of Oct

- no updates from [REDACTED]

[REDACTED]  
- [REDACTED] pitched their vision of what they'd like to see us build for [REDACTED] – passed this to the product team  
- [REDACTED] also have ideas – they're going to work them up and send them over in a couple of weeks

[REDACTED]  
- [REDACTED] added to the [REDACTED] and starting to do end to end testing of the export flow

[REDACTED]  
- [REDACTED] [REDACTED] who pushed us again on [REDACTED] on our side to get this across the line – not high-pri, so made no firm commitments.

[REDACTED] [REDACTED]  
- major product update: we're moving to [REDACTED] This has impact [REDACTED] – still analyzing impact of this on planning – will [REDACTED]  
- [REDACTED]  
- [REDACTED]  
- [REDACTED]  
- Preparations continue for [REDACTED] – [REDACTED]

[REDACTED]  
[REDACTED] are sending us [REDACTED] – this may put us back and increases the risk we [REDACTED] so will have more info on eta impact hopefully next week.

[REDACTED]  
Met with [REDACTED] to improve [REDACTED]. They're also interested in us helping them acquire [REDACTED] Early stages, but preparing the ground for effort here in Q1 2014

**Bonus:**

I Worked on a [REDACTED] – this drives you to [REDACTED]. Was picked to present to [REDACTED] next Tues (10/15). Feedback more broadly has been positive, so looking at changes/features and roadmap to help this ship.

S

--  
**Simon Cross**  
**Product Partnerships**  
www.facebook.com/sicross @sicross  
Facebook, 1601 Willow Road, Menlo Park, CA 94025, USA